

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JACKSON LEE,

Plaintiff,

vs.

WHITE CAT MEDIA, INC.

Defendant.
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: Index No. 17-cv-08122-JSR
:
: ECF Case
:
: **AFFIDAVIT IN SUPPORT OF**
: **MOTION FOR DEFAULT**
:
:

STATE OF NEW YORK)
)
COUNTY OF NASSAU)

SS.:

1. I am a member of the Bar of this Court and managing attorney of the firm of Liebowitz Law Firm, PLLC, attorneys for Plaintiff in the above-entitled action. I am familiar with all the facts and circumstances in this action.
2. I make this affidavit in support of Plaintiff's motion for the entry of a default judgment against Defendant.
3. Plaintiff Lee filed the Complaint in this action on October 22, 2017. See Dkt. 1. On November 9, 2017, Defendant was served a Summons, Civil Cover Sheet and Complaint at its place of business located at 121 West 27th Street, #701, New York, New York 10001 where Samantha Smith was authorized to accept process. See Dkt. 8. Pursuant to Fed. R. Civ. P. 12, an answer or other response to the Complaint was due on or before November 30, 2017.
4. On December 8, 2017, the Clerk issued a Certificate of Default.

5. In addition to awarding Plaintiff statutory damages for the infringement, we ask the Court to grant Plaintiff's reasonable attorney's fees in the amount of \$3,600.00, plus \$700 in costs. In addition to regular court filing fees, serving costs and copyright registration costs, the Plaintiff's lead attorney spent 8 hours at \$450 per hour on this matter.

Dated: December 11, 2017
Valley Stream, New York

LIEBOWITZ LAW FIRM, PLLC

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